



ANTI BRIBERY & CORRUPTION POLICY

PGCS Ltd. expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. PGCS Ltd. expects the same approach to doing business from its business partners and suppliers. Pursuant to this PGCS Ltd. will not tolerate bribery or corruption in any form and has a 'zero tolerance' approach to any breach of this policy.

Application

This means that the company and its employees will never seek, accept or give a bribe, facilitation payment, 'kickback' or other improper payment. We must also always ensure that we operate with appropriate transparency in all our business dealings.

If you are in any doubt as to whether something is appropriate please seek advice from your line manager or company director.

Our Aim

We will take suitable steps to ensure that:

1. We do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.
2. We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that we do business with.
3. We engage and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach.
4. We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures) policies and training programmes on induction and subsequently.
5. We adopt management control systems that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.
6. We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations.
7. We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

Signed:

Date: 31/03/2017

Rob Syms
Managing Director

Document: PGCS-17 Anti Bribery and Corruption Policy	Page 1 of 1
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